GEORGE B. FREEHILL
WILLIAM L. JUSKA, JR.
JAMES L. ROSS*
ERIC E. LENCK
JOHN J. WALSH*
PATRICK J. BONNER*
PETER J. GUTOWSKI
MARK F. MULLER
WAYNE D. MEEHAN*
DON P. MURNANE, JR.△
THOMAS M. RUSSO
THOMAS M. CANEVARIᵀ
MICHAEL FERNANDEZ*
JOHN F. KARPOUSIS*△
MICHAEL E. UNGER*ᵀ
WILLIAM J. PALLAS*
GINA M. VENEZIA*△
LAWRENCE J. KAHN*
BARBARA G. CARNEVALE*
MANUEL A. MOLINA
JUSTIN T. NASTRO*
PAMELA L. SCHULTZ*ᵀ
DANIEL J. FITZGERALD*ᵀ△
MICHAEL C. ELLIOTT*
JAN P. GISHOLTᵀ

* ALSO ADMITTED IN NEW JERSEY
ᵀ ALSO ADMITTED IN CONNECTICUT
△ ALSO ADMITTED IN WASHINGTON, D.C.
º ALSO ADMITTED IN LOUISIANA

LAW OFFICES OF

FREEHILL HOGAN & MAHAR LLP

80 PINE STREET

NEW YORK, N.Y. 10005-1759

TELEPHONE (212) 425-1900

FACSIMILE (212) 425-1901

E-MAIL: reception@freehill.com

www.freehill.com

NEW JERSEY OFFICE
549 SUMMIT AVENUE
JERSEY CITY, N.J. 07306-2701
TELEPHONE (973) 623-5514
FACSIMILE (973) 623-3813

CONNECTICUT OFFICE
23 OLD KINGS HIGHWAY SOUTH
DARIEN, CT 08820-4538
TELEPHONE: (203) 921-1913
FACSIMILE (203) 358-8377

MEMO ENDORSED

RECEIVED
MAR - 4 2008
CHAMBERS OF
P. KEVIN CASTEL
U.S.D.J.

March 3, 2008

USDS SDNY
344-07/DPM/MAM
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 3/4/08

BY HAND

Hon. P. Kevin Castel
United States District Judge
United States Courthouse
500 Pearl Street, Room 2260
New York, New York 10007-1312

Re: American Steamship Owners v. Dusung Shipping Co. Ltd.
07 CV 6474 (PKC)

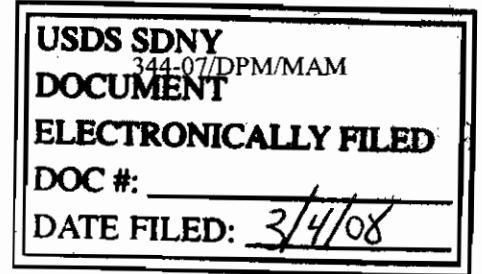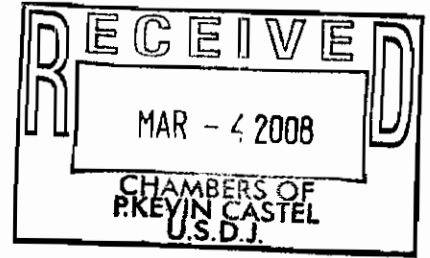
Dear Judge Castel:

We represent the Plaintiff in the above-referenced action involving a maritime attachment under Rule B and write to request that the pre-trial conference scheduled for March 7, 2008 be adjourned 60 days.

Plaintiff filed this action on July 17, 2007 seeking, *inter alia*, to attach the sum of $394,031 from Defendant Dusung Shipping Co. Ltd. (among other Defendants). On the same day, Your Honor granted Plaintiff's application for the issuance of Process of Maritime Attachment and Garnishment ("PMAG"). On or about August 20, 2007, Plaintiff attached the sum of $20,000 and Notice of Attachment was provided on the same date to Dusung. Plaintiff has not attached any funds from the other Defendants. To date, Defendants have not appeared in the action or moved to vacate the attachment despite the fact that prior Notices of Pre-Trial Conference have been sent via electronic mail. Plaintiff continues its daily efforts of serving the PMAG upon various New York banks to obtain full security for its claims from all the Defendants.

As we advised Your Honor in our January 2, 2008 letter, Plaintiff has complied with the Hague Convention service requirements by translating the Summons, Complaint and the Hague

NYDOCS1/299895.1

Hon. P. Kevin Castel
March 3, 2008
Page 2

Convention Form into Korean and mailing same to the Korean Central Authority. In fact, as the attached documents indicate, the Korean Central Authority received all necessary documentation to effect service upon Defendants on January 7, 2008. Plaintiff is presently awaiting receipt of the Certificate of Service from the Korean Government. Upon receipt, we will file same with the Clerk of the Court.

In light of the foregoing, we respectfully request that the Court grant the within application.

We thank the Court for its attention to this matter.

Respectfully yours,
FREEHILL HOGAN & MAHAR LLP

Manuel A. Molina

NYDOCS1/299895.1

FREEHILL, HOGAN & MAHAR LLP

AB0015 SF (11/05)

DHL EXPRESS (USA), INC.

DHL Express (USA), Inc., 1200 South Pine Island Road, Plantation, Florida 33324   **Original (DHL Billing) Copy**

Process and track your shipment online: http://www.dhl.com

1-800-CALL-DHL in USA only

INTERNATIONAL SHIPMENT
WAYBILL (Non-negotiable)

CMG CMG   ORIGIN
7 4 0 5 0 7 0 5 9 5   MTC

7405070595

DESTINATION CODE

1 | Payer account number and shipment value protection details

Charge to ☐ Shipper ☐ Receiver ☐ 3rd Party

Payer Account No.

☐ Cash
☐ Check
☐ Credit Card

Not all payment options are available in all countries.

Shipment Value Protection (see reverse)

☐ Yes Declared Value for Carriage (in US $) _____

2 | From (Shipper)

Shipper's Account Number   Contact Name
763534858   N. MOLINA

Shipper's Reference (up to 35 characters)
349/07 DOM/MAHM

Company Name
FREEHILL HOGAN & MAHAR

Address
PETER MCCARTHY 24TH FLOOR
80 PINE ST FL 24
NEW YORK NY

Post/ZIP Code (required)   Phone, Fax, or E-mail (required)
300051759   (212)425-1900

3 | To (Receiver)

Company Name
NATIONAL COURT ADM.

Contact Person
DIRECTOR OF INT'L AFFAIRS

Delivery Address DHL Cannot Deliver to a PO Box
967 Seocho-dong Seochogu
Seoul 137-750
Republic of Korea

Post/ZIP Code (required)   Country   Phone, Fax, or E-mail (required)
KOREA

4 | Shipment Details

Total number of packages   Total Weight If DHL Express Document packaging used, enter XD.   Pieces   Dimensions (in inches) Length Width Height

lbs

@ x x
@ x x
@ x x

5 | Full Description of Contents
Give Content and Quantity

LETTERS

6 | Dutiable Shipments Only (Customs requirement)

Attach the original and four copies of a Proforma or Commercial Invoice.
Export License No./Symbol (if applicable)   Receiver's VAT/GST or Shipper's EIN/SSN

Declared Value for Customs (in US $) (as on commercial/proforma invoice)   Schedule B Number / Harmonized Code (if applicable)

AES TRANSACTION NUMBER

TYPE OF EXPORT
☐ Permanent ☐ Repair/Return ☐ Temporary

Destination Duties/Taxes If left blank, Receiver pays duties/taxes.
☐ Receiver ☐ Shipper ☐ Other _____

The commodities, technology or software to be exported from the U.S. are in compliance with the U.S. Bureau of Export Administration. Diversion to countries contrary to U.S. law prohibited.

7 | Shipper's Authorization (signature required)

I/we agree that DHL's standard terms apply to this shipment and limit DHL's liability for loss or damage to U.S. $100. The Warsaw Convention may also apply (see reverse). I/we authorize DHL to complete any other documents necessary to export this shipment. I/we understand that Shipment Value Protection is available on request. I/we agree to pay all charges (and the charge if the recipient or 3rd party refuses to pay). I/we understand that DHL DOES NOT TRANSPORT CASH.

Signature (required)   Date   /   /

2002 ©

8 | Products & Services

Not all products or service options are available in every location.

☐ International Express Envelope
☐ Non-Dutiable (International Document Service)
☐ Dutiable (Worldwide Priority Express)
☐ Other _____

Service Options (extra charges may apply)
☐ Saturday Delivery ☐ Special Pickup
☐ Delivery Notification ☐ Signature Required
Other _____

Global Mail
☐ Int. Priority ☐ Int. Standard ☐ IPA ☐ ISAL
☐ Dom. Priority ☐ Dom. Standard
☐ Other _____

DIMENSIONAL/CHARGEABLE WEIGHT   lbs

SERVICES   CHARGES

Drop Box #   TOTAL

TRANSPORT COLLECT STICKER No.

PAYMENT DETAILS (Check, Card No.)
No.
Type   Expires
Auth.

PICKED-UP BY
Route No.
Time   /   /   Date   /   /

Complete sections 1-8. You are making 4 copies, please press hard.

Contac

DHL

| Ship | Track | Services | About DHL | Help |

DHL USA Home   DHL Global

Track

- ▶ Track by number
- ▶ Track by reference
- ▶ Get delivery signature
- ▶ Track DHL Same Day service
- ▶ Monitor shipments

Log in to DHL

User ID [   ]

Password [   ]

☐ Remember my User ID

Log In ▶

▶ Forgot password/user ID?

New to DHL online?
Registration is quick and free.
▶ Sign up now

Track results detail   ▶ Pr

Current status for 7405070595...

Shipment delivered. ✓

Delivered on: 1/7/2008 10:20 am
Delivered to:
Signed for by: JEONGSOO JI   What is this?
Want to get the status of all your shipments in one place?   Learn more about DHL ProVie

Tracking history...

Date and time		Status	DHL Facility Location	
1/7/2008 am	10:20	Shipment delivered.	Seoul, Korea, Republic Of	Why Is
	8:28 am	With delivery courier.	Seoul, Korea, Republic Of	
1/4/2008 pm	6:17	Arrived at DHL facility.	Seoul, Korea, Republic Of	
	4:26 pm	Depart Facility	Icn - Gateway, Korea, Republic Of	
	4:21 pm	Processed at DHL Location.	Icn - Gateway, Korea, Republic Of	
	3:29 pm	Transit through DHL facility	Icn - Gateway, Korea, Republic Of	
1/3/2008 am	6:24	Depart Facility	Wilmington - Clinton Field, OH	
	1:44 am	In transit.	Wilmington - Clinton Field, OH	
	12:04 am	Depart Facility	New York, NY	
1/2/2008 pm	6:56	Transit through DHL facility	New York, NY	
	6:07 pm	Depart Facility	New York Midtown, NY	
	5:45 pm	Processed at DHL Location.	New York Midtown, NY	
	3:54 pm	Shipment picked up	New York Midtown, NY	

Shipment details...

From	To	Shipment information
New York Midtown, NY United States	Seoul, Korea, Republic Of	Ship date: 1/2/2006 Pieces: 1 Total weight: 1 lb No